

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

FEE STATEMENT COVER SHEET

Debtor: LTL Management LLC Applicant: Parkins & Rubio LLP
Case No.: 23-12825 (MBK) Client: Ad Hoc Committee of Supporting Counsel
Chapter: 11 Case Filed: April 4, 2023

**SECTION I
FEE SUMMARY**

Monthly Fee Statement Covering the Period
July 1, 2023 through August 11, 2023

Total Fees:	\$ 72,157.50
Total Disbursements:	\$ 234.98
Minus % holdback of Fees:	\$ 14,431.50
Amount Sought at this Time	\$ 57,960.98

NAME OF PROFESSIONAL & TITLE	YEAR ADMITTED (Or Years of Professional Service)	HOURS	RATE	FEE
1. Lenard Parkins, Partner	1976	32.0	\$1,150.00	\$36,800.00
2. Charles Rubio, Partner	2008	38.5	\$775.00	\$29,837.50
3. Moira Rankin Cooper, Associate	1990	1.2	\$450.00	\$540.00
4. Gloria Jackson, Paralegal	N/A	19.4	\$200.00	\$3,880.00
5. Jennifer Cook, Paralegal	N/A	5.5	\$200.00	\$1,100.00

**SECTION II
SUMMARY OF SERVICES**

SERVICES RENDERED	HOURS	FEE
a) Asset Analysis and Recovery: Identification and review of potential assets including causes of action and non-litigation recoveries.	0	\$0
b) Asset Disposition Sales, leases (section 365 matters), abandonment and related transaction work related to asset disposition.	0	\$0
c) Assumption and Rejection of Leases and Contracts Analysis of leases and executory contracts and preparation of motions specifically to assume or reject.	0	\$0
d) Avoidance Action Analysis Review of potential avoiding actions under Sections 544–549 of the Code to determine whether adversary proceedings are warranted.	0	\$0
e) Budgeting (Case) Preparation, negotiation, and amendment to budgets for applicant.	0	\$0
f) Business Operations Issues related to debtor-in-possession operating in chapter 11 such as employee, vendor, tenant issues and other similar problems.	0	\$0
g) Case Administration Coordination and compliance activities not specifically covered by another category.	6.9	\$6,697.50
h) Claims Administration and Objections Specific claim inquiries; bar date motions; analyses, objections and allowances of claims.	0	\$0
i) Corporate Governance and Board Matters Preparation for and attendance at Board of Directors meetings; analysis and advice regarding corporate governance issues, including trustee, examiner, and CRO issues; review and preparation of corporate documents (e.g., articles and bylaws, etc.).	0	\$0
j) Employee Benefits and Pensions Review and preparation related to employee and retiree benefit issues, including compensation, bonuses, severance, insurance benefits, and 401K, pensions, or other retirement plans.	0	\$0
k) Employment and Fee Applications Preparation of employment and fee applications for self or others; motions to establish interim procedures.	17.3	\$3,977.50

l) Employment and Fee Application Objections Review of and objections to the employment and fee applications of others.	0	\$0
m) Litigation Contested Matters and Adversary Proceedings (not otherwise within a specific project category), each identified separately by caption and adversary number, or title of motion or application and docket number, and using the Uniform Task Based Management System (“UTBMS”) Litigation Task Code Set.	11.8	\$10,105.00
n) Meetings and Communications with Creditors Preparation for and attendance at section 341(a) meeting and any other meetings with creditors and creditors’ committees.	0	\$0
o) Non-Working Travel Non-working travel where the court reimburses at less than full hourly rates.	0	\$0
p) Plan and Disclosure Statement Formulation, presentation and confirmation; compliance with the plan confirmation order, related orders and rules; disbursement and case closing activities, except those related to the allowance and objections to allowance of claims.	60.6	\$51,377.50
q) Real Estate Review and analysis of real estate-related matters, including purchase agreements and lease provisions (e.g., common area maintenance clauses).	0	\$0
r) Relief from Stay and Adequate Protection Matters relating to termination or continuation of automatic stay under 11 U.S.C. 362 and motions for adequate protection under 11 U.S.C. 361.	0	\$0
s) Reporting Statement of financial affairs, schedules, monthly operating reports, and any other accounting or reporting activities; contacts with the United States Trustee not included in other categories.	0	\$0
t) Tax Analysis of tax issues and preparation of federal and state tax returns.	0	\$0
u) Valuation Appraise or review appraisals of assets.	0	\$0
SERVICE TOTALS:	96.6	\$72,157.50

**SECTION III
SUMMARY OF DISBURSEMENTS**

DISBURSEMENTS	AMOUNT
a) Copies	\$0
b) Outside Printing	\$0
c) Telephone	\$0
d) Facsimile	\$0
e) Online Research	\$0
f) Delivery Services/Couriers	\$0
g) Postage	\$0
h) Local Travel	\$0
i) Out-of-town Travel	\$0
j) Out-of-town Travel: Transportation	\$0
k) Out-of-town Travel: Hotel	\$234.98
l) Out-of-town Travel: Meals	\$0
m) Out-of-town Travel: Ground Transportation	\$0
n) Out-of-town Travel: Other	\$0
o) Meals (local)	\$0
p) Court Fees	\$0
q) Subpoena Fees	\$0
r) Witness Fees	\$0
s) Deposition Transcripts	\$0
t) Trial Transcripts	\$0
u) Trial Exhibits	\$0
v) Litigation Support Vendors	\$0
w) Experts	\$0
x) Investigators	\$0
y) Arbitrators/Mediators	\$0
z) Other	\$0
DISBURSEMENTS TOTAL:	\$234.98

I certify under penalty of perjury that the above is true.

Date: August 28, 2023

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

PARKINS & RUBIO LLP

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Charles M. Rubio, Esq.
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crubio@parkinsrubio.com
Pennzoil Place
700 Milam St., Suite 1300
Houston, TX 77002
Tel: (713) 715-1666

Ad Hoc Committee of Supporting Counsel

In re:

LTL Management LLC,
Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Honorable Michael B. Kaplan

**MONTHLY FEE STATEMENT OF PARKINS & RUBIO LLP,
AD HOC COMMITTEE OF SUPPORTING COUNSEL, FOR THE PERIOD
JULY 1, 2023 THROUGH AUGUST 11, 2023**

Parkins & Rubio LLP (“P&R”) submits this Monthly Fee Statement (the “Statement”) for services rendered and expenses incurred as Ad Hoc Committee of Supporting Counsel¹ for the period commencing July 1, 2023 and ending August 11, 2023 (the “Statement Period”), pursuant to the *Order Establishing Procedures for Interim Compensation and Reimbursement of Retained Professionals* [Docket No. 562] (as modified, the “Interim Fee Procedures Order”).

The billing invoices, along with a detailed breakdown of all out-of-pocket disbursements necessarily incurred by P&R for the Statement Period are annexed hereto. These invoices detail the services performed by PR.

¹ On June 20, 2023, the Bankruptcy Court entered the *Order Authorizing the Debtor to Enter into an Expense Reimbursement Agreement with Ad Hoc Committee of Supporting Counsel* [Docket. 838] that provides for the period of April 18, 2023, through the termination of the Reimbursement Agreement (together, the “Fees and Expenses”).

The fees payment and the expense reimbursement requested in this Statement is as follows:

Fees (100%)	Fee Holdback (20%)	Fee Payment (80%)	Expense Reimbursement (100%)
\$72,157.50	\$14,431.50	\$57,726.00	\$234.98

WHEREFORE, P&R respectfully requests payment of fees for the Statement Period of \$57,960.98 (80% of total fees and 100% of expenses) in accordance with the Interim Fee Procedures Order.

Dated: August 28, 2023

/s/: Charles M. Rubio
PARKINS & RUBIO LLP
Ad Hoc Committee of Supporting Counsel

Summary of Invoices



Parkins & Rubio LLP
 700 Milam Street, Suite 1300
 Houston, Texas 77002
 United States
www.parkinsrubio.com

LTL (AD HOC COMMITTEE OF SUPPORTING COUNSEL)

Invoice	Project Category	Invoice Amount
Invoice #942	Case Administration	\$6,697.50
Invoice #943	Employment and Fee Applications	\$3,977.50
Invoice #944	Litigation	\$10,105.00
Invoice #945	Plan and Disclosure Statement	\$51,377.50

Fees	\$72,157.50
Less 20%	\$14,431.50
Fee Payment Requested	\$57,960.98
Expense Reimbursement(100%)	\$234.98
Fee Payment Requested Plus Expense Reimbursement	\$57,960.98

Payment Instructions

Check Payment Information

Remit checks to: Parkins & Rubio LLP
700 Milam Street, Suite 1300
Houston, Texas 77002

Wire Transfer and Online Payment Information

Bank Name/Address: JPMorgan Chase Bank, N.A.
dba Chase Bank
8 East Pkwy, Scarsdale, NY 10583

Bank ABA/Routing #: ABA Number 021000021 (For international transfers: CHASUS33)

Name/Account #: Parkins & Rubio LLP
Operating Account
Account Number 761958377



INVOICE

P&R Internal Reference # 942
Date: 08/22/2023

Parkins & Rubio LLP
700 Milam Street, Suite 1300
Houston, Texas 77002
United States
www.parkinsrubio.com

LTL (Ad Hoc Committee)

Project Category: Case Administration

Date	Attorney	Description	Quantity	Rate	Total
08/01/2023	LMP	Call with J. Onder on case dismissal issue (0.3); Steering Committee call to discuss case dismissal issues (1.0).	1.30	\$1,150.00	\$1,495.00
08/01/2023	CMR	Steering Committee call to discuss case dismissal issues.	1.00	\$775.00	\$775.00
08/02/2023	LMP	Attend hearing on motions for substantial contribution and discussion of dismissal order and related dismissal issues (1.8); review TCC draft dismissal order and discuss needed changes with C. Rubio for transmission to Paul Hastings (0.5).	2.30	\$1,150.00	\$2,645.00
08/02/2023	CMR	Attend hearing on motions for substantial contribution and discussion of dismissal order and related dismissal issues (1.8); review TCC draft dismissal order and discuss needed changes with L. Parkins and send marked up version to Paul Hastings (0.5).	2.30	\$775.00	\$1,782.50
Quantity Subtotal					6.9

Time Keeper	Quantity	Rate	Total
Lenard M Parkins	3.6	\$1,150.00	\$4,140.00

Charles Rubio	3.3	\$775.00	\$2,557.50
Quantity Total			6.9
Subtotal			\$6,697.50
Total			\$6,697.50

Minus 20% Holdback Fee in the amount of \$1,339.50.



INVOICE

P&R Internal Reference # 943
Date: 08/22/2023

Parkins & Rubio LLP
700 Milam Street, Suite 1300
Houston, Texas 77002
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LTL (Ad Hoc Committee)

Project Category: Employment and Fee Applications

Date	Attorney	Description	Quantity	Rate	Total
07/10/2023	GJ	Draft Fee Statements for April 2023 through May 2023 and forward the same to C. Rubio to make comments.	6.50	\$200.00	\$1,300.00
07/11/2023	GJ	Begin preparation work for the June 2023 Fee Statement.	4.30	\$200.00	\$860.00
07/12/2023	GJ	Review and revise April, 2023, May, 2023 and June, 2023 Fee Statements and forward to C. Rubio to finalize.	4.40	\$200.00	\$880.00
07/20/2023	CMR	Prepare materials requested by Jones Day in connection with the April and May fee statements and send to I. Perez.	0.40	\$775.00	\$310.00
07/20/2023	GJ	Pull LEDES files for April 2023, May 2023 and Beneficiary Confirmation form to C. Rubio to review.	0.40	\$200.00	\$80.00
08/02/2023	GJ	Review and prepare CNO for Fee Statements and circulate the same to C. Rubio to review and finalize.	0.60	\$200.00	\$120.00
08/02/2023	CMR	Review draft dismissal order and order providing for reimbursement of AHC professional fees and draft proposed insert to dismissal order and send to L. Parkins for comments.	0.50	\$775.00	\$387.50
08/11/2023	GJ	Pull and circulate LEDES files for June 2023 fee statement.	0.20	\$200.00	\$40.00

Quantity Subtotal 17.3

Time Keeper	Quantity	Rate	Total
Charles Rubio	0.9	\$775.00	\$697.50
Gloria Jackson	16.4	\$200.00	\$3,280.00

Quantity Total 17.3

Subtotal \$3,977.50

Total \$3,977.50

Minus 20% Holdback Fee in the amount of \$795.50.



INVOICE

P&R Internal Reference # 944
Date: 08/22/2023

Parkins & Rubio LLP
700 Milam Street, Suite 1300
Houston, Texas 77002
United States
www.parkinsrubio.com

LTL (Ad Hoc Committee)

Project Category: Litigation

Date	Attorney	Description	Quantity	Rate	Total
07/20/2023	CMR	Review Debtor's proposed findings of facts and conclusions of law in connection with MTD.	0.90	\$775.00	\$697.50
07/28/2023	LMP	Calls with J. Onder on order dismissing chapter 11 case (.5); review dismissal decision (1.6).	2.10	\$1,150.00	\$2,415.00
07/29/2023	CMR	Analyze order granting motions to dismiss.	2.20	\$775.00	\$1,705.00
08/01/2023	CMR	Further review and analyze order on motion to dismiss to prepare for hearing with AHC Steerco on next steps (.6); internal meeting with L. Parkins and M. Cooper to discuss MTD standard for Honx case (asbestos case in S.D. Tex. Bankr.) in connection with analyzing next steps for the Debtor and the AHC (1.2).	1.80	\$775.00	\$1,395.00
08/01/2023	LMP	Internal meeting with C. Rubio and M. Cooper to discuss MTD standard for Honx case (asbestos case in S.D. Tex. Bankr.) in connection with analyzing next steps for the Debtor and the AHC (1.2).	1.20	\$1,150.00	\$1,380.00
08/01/2023	MRC	Internal meeting with L. Parkins and C. Rubio to discuss MTD standard for Honx case (asbestos case in S.D. Tex. Bankr.) in connection with analyzing next steps for the Debtor and the AHC.	1.20	\$450.00	\$540.00

08/02/2023	CMR	Attend hearing on motions for substantial contribution.	1.80	\$775.00	\$1,395.00
08/07/2023	CMR	Review and make comments to letter to Kaplan regarding dismissal order and send back to Paul Hastings.	0.30	\$775.00	\$232.50
08/07/2023	LMP	Review and make comments to letter to Kaplan regarding dismissal order and send to C. Rubio to incorporate comments.	0.30	\$1,150.00	\$345.00

Quantity Subtotal 11.8

Time Keeper	Quantity	Rate	Total
Lenard M Parkins	3.6	\$1,150.00	\$4,140.00
Moir Rankin Cooper	1.2	\$450.00	\$540.00
Charles Rubio	7.0	\$775.00	\$5,425.00

Quantity Total 11.8

Subtotal \$10,105.00

Total \$10,105.00

Minus 20% Holdback Fee in the amount of \$2,021.00.



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P&R Internal Reference # 945
Date: 08/22/2023

LTL (Ad Hoc Committee)

Project Category: Plan and Disclosure Statement

Date	Attorney	Description	Quantity	Rate	Total
07/10/2023	CMR	Review Debtor's revised disclosure statement (3.4); call with L. Parkins to discuss same (.6); follow up email with co-counsel regarding same (.2).	4.20	\$775.00	\$3,255.00
07/10/2023	LMP	Review and comment on newly delivered draft of disclosure statement for filing by Debtor-LTL (3.1); call with C. Rubio regarding comments (.6).	3.70	\$1,150.00	\$4,255.00
07/11/2023	LMP	Review and comment on new updated TDP's sent by Debtor for filing along with disclosure statement (7.1) call with C. Rubio regarding same (.4); call with J. Onder regarding same (.3).	7.80	\$1,150.00	\$8,970.00
07/11/2023	GJ	Prepare binders for the revised TDP and forward the same to L. Parkins to review.	0.60	\$200.00	\$120.00
07/11/2023	CMR	Detailed review of revised TDP and prepare updated TDP issues list and email to J. Onder (8.8); call with L. Parkins regarding same (.4)	9.20	\$775.00	\$7,130.00
07/12/2023	GJ	Print Amended Disclosure Statement, create binders and forward to L. Parkins to review.	0.70	\$200.00	\$140.00
07/12/2023	CMR	Call with L. Parkins (1.0) and J. Onder regarding TDP	1.60	\$775.00	\$1,240.00

		issues (.4); prepare email to Steerco and co-counsel to set up call regarding TDP issues (.2).			
07/12/2023	LMP	Call with C. Rubio to go over comments to new TDP from debtor (1.0); call with J. Onder regarding new TDP and issues regarding it (.4).	1.40	\$1,150.00	\$1,610.00
07/16/2023	CMR	Call with J. Onder, R. Siko and co-counsel to discuss revised TDP issues list (1.5); further revise TDP issues list and circulate to Steerco and co-counsel and set up follow up call (1.5).	3.00	\$775.00	\$2,325.00
07/16/2023	LMP	Extended Zoom call with committee counsel and steering committee to discuss TDP status and updates (1.5).	1.40	\$1,150.00	\$1,610.00
07/18/2023	CMR	Coordinate meeting time on plan and TDP issues with M. Michelli (.2); call with L. Parkins regarding outstanding TDP issues and next steps (.3).	0.50	\$775.00	\$387.50
07/18/2023	LMP	Call with C. Rubio regarding outstanding TDP issues and next steps (.3).	0.30	\$1,150.00	\$345.00
07/19/2023	GJ	Prepare Disclosure Statement and Notice of Disclosure Hearing binders for L. Parkins to review.	1.70	\$200.00	\$340.00
07/19/2023	CMR	Call with K. Lounsberry and AHC Co-counsel to review TDP and Plan issues (3.1); call with Steerco to discuss TDP issues (1.4).	4.50	\$775.00	\$3,487.50
07/19/2023	LMP	Extended call with counsel for J&J and Debtor to review TDP issues (3.1); call with steering committee of AHOC to discuss TDP issues and plan issues (1.0); memo to committee co-chair on strategy (.4).	4.50	\$1,150.00	\$5,175.00
07/21/2023	JC	Review docket and gather and assemble bar date pleadings for L. Parkins review; forward same for review.	3.30	\$200.00	\$660.00
07/22/2023	JC	Review docket and gather and assemble pleading regarding estimation proceedings for review for L. Parkins; forward same for review.	2.20	\$200.00	\$440.00
07/24/2023	CMR	Review Imerys Settlement term sheet (1.1); call with L. Parkins to discuss same (.9).	2.00	\$775.00	\$1,550.00
07/24/2023	LMP	Review plan issues list from Paul Hastings and draft of Settlement term Sheet for IMERYS/Cyprus and LTL (1.0); call with C. Rubio regarding term sheet settlement structure (.9); transmit same to J. Onder and M. Nachawati (.3).	2.20	\$1,150.00	\$2,530.00

07/25/2023	CMR	Review updated plan issues list from Paul Hastings (.5); call with L. Parkins to discuss plan issues, Imerys term sheet (.6); call with Streerco and co-counsel to discuss same (1.0); follow up email to Steerco regarding interrogatories for claim portfolio (.2).	2.30	\$775.00	\$1,782.50
07/25/2023	LMP	Review updated plan issues list from Paul Hastings (.5); review new settlement term sheet for deal with LTL and Imerys/Cyprus (.8); call with J. Onder regarding Imerys/ Cyprus term sheet (.6); call with Steerco to discuss plan issues list and draft of proposed settlement term sheet for IMERYYS - LTL deal discussion (1.0); call with C. Rubio to discuss plan issues, Imerys term sheet (.6).	3.50	\$1,150.00	\$4,025.00
Quantity Subtotal					60.6

Time Keeper	Quantity	Rate	Total
Lenard M Parkins	24.8	\$1,150.00	\$28,520.00
Charles Rubio	27.3	\$775.00	\$21,157.50
Jennifer Cook	5.5	\$200.00	\$1,100.00
Gloria Jackson	3.0	\$200.00	\$600.00
Quantity Total			60.6
Subtotal			\$51,377.50
Total			\$51,377.50

Minus 20% Holdback Fee in the amount of \$10,275.50.



Parkins & Rubio LLP

Attorneys and Counselors at Law

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INVOICE

P&R Internal Reference # 946
Date: 08/22/2023

LTL (Ad Hoc Committee)

Project Category: Expenses

Type	Attorney	Date	Description	Total
Expense	LMP	06/12/2023	Hotel stay for court hearing.	\$234.98

Time Keeper	Quantity	Rate	Total
		Subtotal	\$234.98
		Total	\$234.98